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UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA

ANGEL JAMES MENDEZ,

Plaintiff,

vs.

COUNTY OF ALAMEDA, a municipal
 corporation; DEPUTY J. RUSSELL;
 DEPUTY DEREK MEZA
 DOES 1-100, inclusive,
 Defendants.

) CASE NO. C 03 4485 PJH
)
) STIPULATION AND ORDER THEREON
) EXTENDING THE DEADLINE FOR
) EXPERT DISCLOSURES AND
) EXPERT DISCOVERY

) Trial Date: 3/27/2006

THE PARTIES, BY AND THROUGH THEIR ATTORNEYS OF RECORD, DO
 HEREBY AGREE AND STIPULATE THAT the deadline for disclosure of
 expert witness information pursuant to F.R.C.P. 26, which is
 currently set for November 1, 2005, shall be extended to
 December 1, 2005 and that the deadline for completion of
 STIP. RE EXPERT DISCOVERY C 03 4485 PJH

1 expert depositions shall be extended to January 25, 2006.

2 The parties are requesting this extension of the expert
3 disclosure and expert deposition cut-off dates due to the
4 following facts:

5 Both parties have recently completed a large number of
6 fact witness depositions, including civilian and law
7 enforcement witness depositions. These depositions will need
8 to be transcribed and reviewed by counsel as well as by their
9 respective experts. Fact discovery does not close until
10 October 14, 2005, and the parties are continuing to endeavor
11 in a cooperative manner to complete the fact discovery by that
12 date.

13 Counsel for the parties believe that the proposed
14 extensions on the deadlines for completion of the expert
15 discovery will allow them sufficient time to obtain the
16 deposition transcripts, provide them for review to their
17 experts and leave time for their respective experts to prepare
18 their Rule 26 reports and be prepared for their depositions.
19 The requested extensions are also sufficiently in advance of
20 the March 27, 2006, trial date and will allow expert discovery
21 to be completed in a timely manner well in advance of the
22 trial date.

23 Plaintiff's counsel also request that the Court grant the
24 requested extension on expert discovery because plaintiff's
25 lead counsel, James Chanin, has recently experienced some
26 health problems which necessitate that he undergo a series of
27 medical tests and procedures in October 2005. Depending on

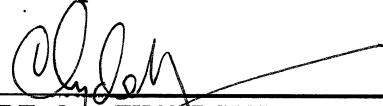
1 the outcome of these tests, further medical procedures may
2 become necessary. Therefore, plaintiff's counsel believe that
3 the requested extension on the deadlines for completion of
4 expert discovery will help to ensure that the expert discovery
5 will be completed by plaintiff's counsel in a timely manner
6 well before the scheduled trial date in March 2006.

7 IT IS SO STIPULATED:

8 Dated: September ²⁹~~28~~, 2005



JAMES B. CHANIN
Attorney for Plaintiff

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10
11 Dated: September ^{MT}~~28~~²⁹, 2005


CLYDE A. THOMPSON
Attorney for Defendants

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13 PURSUANT TO STIPULATION
14 IT IS SO ORDERED:

15 Dated: October 4, 2005


PHYLLIS J. HAMILTON
JUDGE OF THE UNITED STATES
DISTRICT COURT